

JOSEPH B. SALA, Ph.D.

1 A. I'm not refusing to. However, there
2 is an issue of confidentiality as to who has
3 retained our services, and I don't feel
4 comfortable sharing that on the record in this
5 proceedings.

6 Q. Have you ever developed any warnings
7 related to rendering equipment?

8 A. No, I don't believe I have.

9 Q. Have you developed any warnings
10 related to machine guarding?

11 A. I am not positive as to the warnings
12 that I've worked on from a developmental
13 standpoint, as to machine guarding and whether or
14 not the projects I've engaged in would be
15 characterized in that way.

16 Certainly I've developed
17 warnings for industrial pieces of equipment, like
18 what I've just referenced, and there are
19 references to guards in those warnings, but I'm
20 not sure exactly how you mean developed warnings
21 for machine guarding.

22 Q. Well, in your file in this case there
23 are various warnings that have been supplied to
24 me, correct?